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Attorneys for Plaintiff Jeremy Harkins

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF CALIFORNIA

JEREMY HARKINS

Plaintiff,

v.

SUTTER COUNTY; SUTTER COUNTY'S  
SHERIFF DEPARTMENT;  
CALIFORNIA FORENSICS MEDICAL  
GROUP; TAYLOR FITHIAN, M.D.;  
DORIS BROWN, FNP; SHERILL  
McGUIRE, RN; LISA ROGERS, RN;  
SHERIFF BRANDON BARNES;  
CAPTAIN DAN BUTTLER; SERGEANT  
HERNANDEZ; SERGEANT GARCIA;  
SERGEANT EATON; OFFICER E.  
BROOKS; OFFICER OLSON; OFFICER  
SANTOS; OFFICER WEATHERUP;  
WELLPATH MANAGEMENT, INC.;  
THOMAS PANGBURN, M.D. AND  
DOES 1-50,

Defendants.

Case No.: 2:20-CV-00347-KJM-EFB

**STIPULATION RE DISCOVERY CUT-  
OFF DATES & FUTURE PROCEEDINGS;  
ORDER**

IT IS HEREBY STIPULATED by and between the Parties, through their respective  
counsel of record, that the following current discovery cut-off dates and future proceedings of

(1) **Fact Discovery:** January 24, 2022;

(2) **Expert Disclosures:** February 21, 2022;

(3) **Expert Discovery:** May 23, 2022;

(4) **Law and Motion:** July 1, 2022;

(5) **Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by July 28, 2022.

be continued three months, with the new dates being:

(1) **Fact Discovery:** April 22, 2022;

(2) **Expert Disclosures:** May 27, 2022;

(3) **Expert Discovery:** July 19, 2022;

(4) **Law and Motion:** September 26, 2022;

(5) **Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by October 26, 2022.

Good cause exists for this extension as discovery in this case involves numerous depositions, and discovery has been delayed due to the ongoing pandemic. Plaintiff counsel's office was recently closed due to Covid. Plaintiff has also recently had an IME conducted by Defendants' expert doctor, which took a significant amount of time to schedule as the medical issues involve complex, neurological injuries. Defendants also needed additional time to have their experts review the case in order to have the case properly worked up for mediation. Plaintiff's counsel has also recently taken the deposition of Dr. Matthew Foskey in order to continue to prepare for mediation. Dr. Foskey was recently added as a defendant in the case in September of 2021. Mediation is set for March 10, 2022 with Hon. Raul Ramirez.

This is the fourth request for a discovery cut-off extension.

IT IS SO STIPULATED.

DATED: January 24, 2022

ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/Brian G. Lance

Michael D. Green

Brian G. Lance

Attorneys for Plaintiff

1 DATED: January 24, 2022

LAW OFFICES OF JEROME M. VARANINI

2 By: /s/Jerome M. Varanini

3 Jerome M. Varanini  
4 Attorneys for Defendants, California  
5 Forensic Medical Group, Inc.; Wellpath  
6 Management, Inc.; Doris Brown, Lisa  
7 Rogers, and Sherril McGuire

8 DATED: January 24, 2022

BURKE, WILLIAMS & SORENSEN, LLP

9 By: /s/Gregory B. Thomas

10 Gregory B. Thomas  
11 Michael A. Slater  
12 Attorneys for Defendants Sutter County,  
13 Sheriff Brandon Barnes, Captain Dan  
14 Buttler, Sergeant Gloria Hernandez, Sergeant  
15 Jose Garcia-Cortes, Former Sergeant Lestor  
16 Eaton, Officer Ethan Brooks, Sergeant  
17 Kaitlyn Olson, Officer Laurie Helzer, and  
18 Officer Michael Weatherup

15 While the court approves this stipulation, the court recognizes that the new discovery  
16 dates are set for over one year later than initially scheduled in the court's June 25, 2020 order.  
17 ECF No. 30. The court will not look favorably upon a fifth request for an extension. The court  
18 encourages the parties to meet these new discovery deadlines notwithstanding any preparation  
19 necessary for the upcoming mediation.

20 IT IS SO ORDERED

21 DATED: January 24, 2022.

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24 CHIEF UNITED STATES DISTRICT JUDGE  
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